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COMMISSION

Reconciliation of Retailer Claims, 2005

Staff Draft Report

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Introduction

All retail providers are mandated by law (Public Utilities Code, Section 398.5(e) to disclose the source of electricity sold to their customers in California. The law also requires the California Energy Commission (Energy Commission) to prepare an annual report comparing the sources power retailers have disclosed to their consumers to the actual sources used for electricity that is consumed in California. The activities carried out to meet this mandate are referred to as the “SB 1305 Power Source Disclosure Program.”

This report, *Reconciliation of Retailer Claims, 2005* fulfills a part of that mandate for calendar year 2005. After reviewing the available data, the Energy Commission staff concludes that claims made by those retailers who complied with the mandatory reporting requirements are accurate.

Appendix A summarizes statewide participation in the SB 1305 Power Source Disclosure Program. Additionally, Appendix A lists the renewable content of those retail providers making specific claims about their products.

Background

Enacted in 1997, Senate Bill 1305 (Stats. 1997, ch. 796, § 1) requires that retail providers of electricity disclose to consumers “accurate, reliable, and simple to understand information on the sources of energy used to provide electric services.” All retail providers of electricity must disclose fuel source information to consumers about the electricity being sold by using a format developed by the Energy Commission. Retail providers who do not make any claims about the power content of their products may claim what the Power Source Disclosure Program refers to as the “California Power Mix” (referred to in the legislation as “Net System Power”). The California Power Mix is established by the California Energy Commission to represent the sources of electricity that is consumed in state but is not disclosed as “specific purchases” by retail service providers.

Retail providers who make claims differentiating their power mix from the California Power Mix (“claims of specific purchases”) must substantiate the generation sources of their power to a system operator or the Energy Commission. In addition, these retail providers are required to submit detailed information about their power purchases and retail sales to the Energy Commission annually.

Appendix A lists the retail providers who made claims of specific purchases and the type of information submitted to the Energy Commission for the preceding year. Information required to be submitted by retail providers includes power content labels, and for those retail providers making specific claims, annual reports on purchases and sales, and audits that verify the accuracy

of the labels and annual reports. Additionally, Appendix A includes the renewable content, if available, of the retail provider's default product.

The law also requires all electricity generators who report meter data to a system operator to also report generation (in kWh), generator technology, and fuel type consumed (as a percentage of generation) on a quarterly basis. System operators must then make the generation and fuel source information available to the Energy Commission for the purpose of verifying information disclosed to consumers and calculating Net System Power (established annually by the Energy Commission). Generators whose power is claimed as a specific purchase and who do not provide this data to a system operator must provide it annually to the Energy Commission.

Using the detailed information from retail providers and generators, the Energy Commission prepares an annual report comparing annual power source information disclosed to consumers with information on actual electricity generated in California.

In line with SB 1305, the Energy Commission has implemented regulations specifying the following:

- 1) Guidelines and formats for disclosure of generation-related information to system operators and the Energy Commission,
- 2) Guidelines and formats for retail disclosure of fuel source information to consumers by retail providers, and
- 3) Guidelines for annual submissions to the Energy Commission by retail providers.

These regulations governing the "Power Source Disclosure Program" went into effect on October 21, 1998, were amended March 5, 2002, and are found in Title 20 of the California Code of Regulations, beginning with Section 1390.

The Power Content Label

The format adopted for disclosing retail electricity sources to consumers is called the “Power Content Label” (pictured below). Using this label, consumers can compare the power “content” —or resource mix — of a given electricity product with that of the California Power Mix. The California Power Mix represents electricity consumed on a statewide basis, differentiated by fuel type, after subtracting out power that has been specifically claimed by retail providers and self-generation. Retail providers may use the California Power Mix as default and not make claims differentiating their power from the California Power Mix, or they may claim “specific purchases,” which is defined as their actual power mix differentiated by fuel type based on purchases from specific generating facilities. Retail providers who make any claims differentiating their power from the California Power Mix are required to disclose their actual power mix as well as the California Power Mix. The power content label allows retail providers of electricity to distinguish their products from other electricity products in the market on the basis of the mix of resource or fuel type.

| POWER CONTENT LABEL | | |
|--|----------------------|----------------------------|
| ENERGY RESOURCES | PRODUCT NAME* | 2005 CA POWER MIX** |
| | (projected) | (for comparison) |
| Eligible Renewable | 52% | 5% |
| -- Biomass & waste | - | 0% |
| -- Geothermal | - | 4% |
| -- Small hydroelectric | - | 1% |
| -- Solar | - | <1% |
| -- Wind | - | 0% |
| Coal | 19% | 38% |
| Large Hydroelectric | 12% | 24% |
| Natural Gas | 17% | 33% |
| Nuclear | <1% | 0% |
| Other | <1% | 0% |
| TOTAL | 100% | 100% |
| * 50% of Product Name is specifically purchased from individual suppliers. | | |
| ** Percentages are estimated annually by the California Energy Commission based on electricity sold to California consumers during the previous year. | | |
| For specific information about this electricity product, contact Company Name . For general information about the Power Content Label, contact the California Energy Commission at 1-800-555-7794 or www.energy.ca.gov/consumer . | | |

The Energy Commission also allows retail providers, at their option, to publish the gross system power (pictured below) in addition to their Power Content Label. Gross system power is the sum of all in-state generation and imports consumed in California by fuel type. The gross system power mix changes from year to year as generation resources are added to or removed from the mix. Retailers are allowed to add notes outside the Power Content Label that clarifies the distinction between the “CA Power Mix” and “gross system power.” However, by statute, gross system power cannot be used in calculating the power content of a particular product and cannot be inserted in the column of the power content label as “CA power mix.” The 2005 Gross System Power fuel mix listed below accounts for additional generation data received since the adoption of Net System Power in April, 2006. This version of the 2005 Gross System Power fuel mix is an update to the preliminary version that the Energy Commission used to calculate the 2005 Net System Power totals.

| Fuel Type | 2005 Gross System Power |
|----------------------|-------------------------|
| Eligible Renewable | 10.7% |
| -Biomass & waste | 2.1% |
| -Geothermal | 5.0% |
| -Small hydroelectric | 1.9% |
| -Solar | 0.2% |
| -Wind | 1.5% |
| Coal | 20.1% |
| Large hydroelectric | 17.0% |
| Natural gas | 37.7% |
| Nuclear | 14.5% |
| Other | 0.0% |
| Total | 100.00% |

By law, all retail providers must display a Power Content Label in product-specific written promotional materials, must send their customers quarterly label updates, and if specific purchases are claimed, provide them with an annual label that compares the actual annual resource mix with their projected annual mix. The annual label includes an explanation of variations greater than plus or minus five percentage points.

Eighth Year Status

Annual Retail Provider Reports Received

The Energy Commission received *Annual Retail Provider Reports* from 32 companies. Of these, 30 were retail providers, and 2 were wholesalers from which 20 retail providers purchased power. Retail providers Sempra Energy Solutions, Bear Valley Electric, City of Colton, Imperial Irrigation District, and San Diego Gas & Electric did not submit Annual Reports for 2004 activity but submitted them in 2005. The following is the list of all companies that submitted reports:

- 3Phases Energy Services
- Sempra Energy Solutions
- City of Alameda
- Anaheim Public Utility District
- City of Azusa
- Bear Valley Electric
- City of Biggs
- City of Burbank
- City of Colton
- City of Healdsburg
- Imperial Irrigation District
- City of Lodi
- City of Lompoc
- Los Angeles Department of Water and Power
- Merced Irrigation District
- Modesto Irrigation District
- City of Needles
- Palo Alto Electric Utility
- Pacific Gas and Electric Company
- City of Pasadena
- City of Redding
- City of Riverside
- City of Roseville
- Sacramento Municipal Utility District
- San Diego Gas & Electric
- Silicon Valley Power
- Southern California Edison Company
- Surprise Valley Electrification Association
- Turlock Irrigation District
- City of Ukiah
- Bonneville Power Administration
- Northern California Power Authority

These companies collectively claimed specific purchases from 807 different generating facilities. Of the 807 generating facilities, 479 facilities are “renewable” as defined by SB 1305. Of the 479 renewable facilities claimed, 440 are either “registered” renewable generating facilities for purposes of the Energy Commission’s Renewable Energy Program, and/or certified as eligible for California’s Renewable Portfolio Standard. More than one provider claimed generation from 41 of the 807 generating facilities.

| Comparison of Retailer Claims | | |
|---|--------------------|--------------------|
| | <u>2004 Report</u> | <u>2005 Report</u> |
| Number of Generators From Which Specific Purchases were Claimed | 739 | 807 |
| Generators claimed by more than one Retail Provider | 37 | 41 |
| Number of Renewable Generators From Which Specific Purchases were Claimed | 455* | 479 |
| Number of Registered Renewable Generators and RPS Certified Generators From Which Specific Purchases were Claimed | 449 | 440 |

* The 2004 *Reconciliation of Retailer Claims, Report* listed 460 renewable generators.

The numbers of total generators, renewable generators, and registered and certified generators increased because Bear Valley Electric, the City of Pasadena, the Imperial Irrigation District, and SDG&E, claimed specific purchases for the first time for 2005 activity. However, the number of Registered Renewable Generators and RPS Certified Generators decreased because retail providers procured generation from additional facilities that have not certified nor registered with the Energy Commission. In addition, the total specific purchase claims increased from the previous year’s total of 174,939 gigawatt-hours to 194,182 gigawatt-hours, an increase of 19,243 gigawatt-hours.

Availability of Generation Data

To prepare this report, it was necessary to gather 2005 calendar year generation data for all 807 generating facilities claimed by the 30 retail providers. In analyzing the year 2005 claims, the Energy Commission supplemented its SB 1305 generation reports with data from the United States Energy Information Administration (EIA), and the Energy Commission, as described below.

Data from the Energy Information Administration

Generating facilities with a capacity above one megawatt are required to submit generation data to the EIA, using one or more various forms. The EIA has made data from some of the reporting forms publicly available on the Internet. In many cases, however, EIA aggregates generation data and it is not available on a unit-specific basis. The Energy Commission staff was able to obtain generator-specific data from EIA on utility-owned and non-utility owned generating facilities. EIA data played an important part in the development of this report; In other instances, it provided primary data in some cases, and served as a check for data submitted to both the Energy Commission's Electricity Office and the Renewable Energy Program.

Data from the California Energy Commission

The Energy Commission collects data about generation sources on a quarterly basis. The requirements for these reports are found in Title 20, California Code of Regulations, section 1301 et seq. Under law, each owner of an electric power plant over one megawatt in California is required to report the plant's nameplate capacity, fuel type, generation, and fuel usage to the Energy Commission. While plants with a nameplate capacity of one to ten megawatts are required to report annually, generating facilities larger than ten megawatts are required to report quarterly.

Energy Commission staff in the last year has improved the quality and quantity of data used to reconcile retail provider claims with available generation. Most of the data reported to the Energy Commission were for in-state power plants. Using this and information from the EIA, which has data for both in-state and out-of-state power plants, staff found all of the necessary available generation data easily accessible.

In 2004, the Energy Commission began to certify facilities that are eligible for the California's Renewable Portfolio Standard (RPS). However, the definition of "renewable" for the RPS program is different from that for the SB 1305 Power Source Disclosure Program. The Power Source Disclosure Program does not include ocean wave and ocean thermal technologies under its definition of renewable; while those technologies are eligible for RPS certification. The RPS statute, Senate Bill 1078 (Stats. 2002, ch. 516, § 1) also restricts the eligibility of certain types of biomass and small hydroelectric technologies.

In addition to certification under the RPS program, the Energy Commission continues to "register" renewable generating facilities through either the Existing or New Renewable Facilities Programs. Generating facilities that are registered and eligible for funding submit generation data to the Existing Renewable Facilities Program and the New Renewable Resources Account. These two programs have databases containing generation data for many of California's renewable generating facilities.

In 2003, the Western Governors Association and the Energy Commission began the development of the Western Renewable Energy Generation Information System (WREGIS), which will serve as the tracking and verification system of the RPS program. Renewable facilities that are

certified with the Energy Commission for the RPS program will be required to participate in WREGIS. We anticipate that information from WREGIS will also be helpful in meeting our responsibilities under the Power Source Disclosure Program. Staff expects to use data from renewable facilities obtained from WREGIS to aid in preparing future reconciliation reports.

Until the implementation of WREGIS, the RPS Eligibility Guidebook requires that PG&E, Southern California Edison, and San Diego Gas and Electric report their previous year's annual procurement of renewables by generator by May 1 of each year. Additionally, the Energy Commission requires that RPS certified generators (except for those including Qualifying Facilities whereby the retail provider certified the facility on their behalf) are required to annually report their data on monthly generation by May 1 of each year.

Reconciling Retail Providers' Claims

For calendar year 2005, the actual comparison of retail claims with generation data proved to be more complicated than in the prior year. The number of retail providers (including wholesalers and pools) increased from 28 to 32, and the number of generators increased from 739 to 807. Retailers claimed specific purchases totaling 194,182 gigawatt-hours from generators that produced in excess of 288,280 gigawatt-hours. The staff checked to ensure that retail claims for a given generator were less than or equal to the amount of generation reported by that generator. For purposes of the Power Source Disclosure Program, it is not necessary to determine the disposition of all the power generated by each claimed generating facility.

| Retail Provider Claims | | |
|------------------------------------|--------------------|--------------------|
| | <u>2004 Report</u> | <u>2005 Report</u> |
| Specific Renewable Purchases (GWH) | 25,266 | 26,561 |
| Total Specific Purchases (GWH) | 174,939 | 194,182 |
| Reporting Retail Providers | | |
| Investor-Owned Utility | 2 | 4 |
| Electric Service Providers | 3 | 1 |
| Municipal Utility | 20 | 24 |
| Electric Cooperative | 1 | 1 |
| <u>Wholesaler/ Pool</u> | <u>2</u> | <u>2</u> |
| Total | 28 | 32 |

Plant-specific generation data for several generating facilities could not be found from any of the data sources listed in the previous section, but affidavits or audits by third parties submitted under the Power Source Disclosure Program corroborated the claims made for those facilities. While affidavits or audits by third parties may not give the same level of assurance as meter data or data submitted to the EIA, the Energy Commission staff believes that this source is sufficient for the purposes of this report. The staff will continue to close this data collection gap for next year's report.

Given the information available, all companies that complied with the reporting requirements appear to have purchased sufficient amounts of power of the specified fuel types to meet their claims to consumers.

Retail Provider Compliance

Appendix A of this report is a table that lists active retail providers and indicates their compliance with Power Source Disclosure Program requirements in 2005. In addition to showing compliance, Appendix A indicates whether or not the retail provider makes claims, and if so, the renewable percentage of the retail provider's product.

Out of 65 California retail electric providers, 30 retail providers claimed specific purchases for 2005 and all of them have submitted Annual Reports to the Energy Commission. Of those 30 retail providers that claimed specific purchases and submitted annual reports, one is an electric cooperative, one is an energy service provider, four are investor-owned utilities, and 24 are publicly owned utilities. Retail providers that claim specific purchases are required to submit an audit of their sales and procurement to the Energy Commission.¹ The Energy Commission has received seven audits and attestations from the 30 retail providers that claimed specific purchases.

All retail providers, regardless of whether they claim Net System Power or specific purchases, are required to submit quarterly power content labels to the Energy Commission. Thirty-three retail providers submitted quarterly power content labels; 8 of those used the California Mix and 25 used projections of their 2005 power mix. However, of the 30 retail providers that claimed specific purchases in 2005, 18 submitted annual labels.

For most retail providers, the proportion of their default product that is renewable is unknown because most providers claimed Net System Power for 2005. In 2005, one retail provider, an ESP, offered a 100 percent renewable product as its default product. For the other retail providers, the renewable content of the default products ranged from 1 percent to 47 percent.

Although retail providers have claimed more electric generation as specific purchases than in previous years, the Power Source Disclosure Program is experiencing low levels of compliance. For example, only 33 out of 65 retail providers have submitted Power Content Labels and of the 30 providers who claimed specific purchases, only seven have submitted audits. Energy Commission staff informed retail providers of these requirements for 2005 in a January 23, 2006, letter sent to retail providers and in an April 21, 2006 letter informing retail providers of the 2005 Net System Power totals. Appendix A of this report lists all of the retail providers along with checkboxes that indicate whether they claimed specific purchases, submitted power content labels, annual reports, and audits for 2005.

¹ Municipal utilities with only specifically-claimed product can submit an attestation approved the municipal utility's governing body. However, municipal utilities with more than one specifically-claimed product are required to submit an audit.

Because of the differences between the SB 1305 definition of renewable and the definition outlined in SB 1078, the numbers posted under “% Renewable” under Appendix A may not be the same as those used to demonstrate compliance with the RPS. Unlike the SB 1305 definition, SB 1078 prohibits certain types of biomass, allows for renewables purchased in previous years, and includes ocean wave and ocean thermal power.

Expectations for Next Year’s Report

For the analysis of the year 2006 data, The Energy Commission anticipates having access to more complete data through filings and from the EIA for the analysis of the year 2006 data. The Energy Commission also anticipates an increase in the number of retail claims from municipal retail providers, investor-owned utilities, and other retail providers. In February 2006, the California Public Utilities Commission (CPUC) opened a new RPS proceeding that would develop rules for participation of ESPs, Community Choice Aggregators (CCAs), small utilities, and multi-jurisdictional utilities in the RPS. Because these entities may have to report their RPS procurement to the Energy Commission, these entities would be making specific purchases claims, thus requiring them to complete Power Source Disclosure Program Annual Reports.

Many changes were made to the *Annual Retail Provider Reports* after they had been submitted on time (March 1, 2006), and a number of reports were submitted late. These changes and late submissions created problems in determining the total amount of Specific Purchases used to calculate Net System Power, which must be reported by April 15 of each year. The staff will continue to take additional steps to provide retail providers with software packages to assist in preparing the *Annual Retail Provider Report*. The staff will also continue the high level of outreach to retail providers prior to the reporting date to assist in answering questions related to the reporting of specific purchases in the *Annual Retail Provider Reports*.

As California develops its RPS Program, staff will explore further interaction between the two programs. Facilities that could qualify for the RPS must be certified by the Energy Commission which would also make them a part of the WREGIS tracking system that is being developed by the Energy Commission and the Western Governors Association. The Power Source Disclosure Program could use data extracted from WREGIS for future reports.

Appendix A: 2005 RETAIL PROVIDER COMPLIANCE

| | | ALL retail providers are required to submit quarterly power content labels. | | | | ONLY retail providers that claim specific purchases are required to submit an Annual Label, Annual Report, and an Audit. | | | This is the renewable content of the retail provider's default product, as based on the SB 1305 definition of renewable. | |
|-----------------------------------|-------------------------------------|---|-------------------------------------|-------------------------------------|-------------------------------------|--|-------------------------------------|-------------------------------------|--|--|
| Retail Provider | Specific Claims | 1st Qtr. Label | 2nd Qtr. Label | 3rd Qtr. Label | 4th Qtr. Label | Annual Label (True Up) | Annual Report | Audit or Letter of Attestation | % Renewable | |
| Electric Cooperatives | | | | | | | | | | |
| ANZA | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |
| PLUMAS-SIERRA | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |
| SUPRISE VALLEY | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1% | |
| VALLEY ELECTRIC ASSN. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |
| Electric Service Providers | | | | | | | | | | |
| 3Phases Electrical Consulting | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | 100% | |
| American Utility Network (A.U.N.) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |
| APS Energy Services | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |
| Calpine Power America | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |
| City of Corona | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |

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|--------------------------|-------------------------------------|---|-------------------------------------|-------------------------------------|-------------------------------------|--|-------------------------------------|-------------------------------------|--|--|--|
| Retail Provider | Specific Claims | 1st Qtr. Label | 2nd Qtr. Label | 3rd Qtr. Label | 4th Qtr. Label | Annual Label (True Up) | Annual Report | Audit or Letter of Attestation | % Renewable | | |
| Coral Energy | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| Commonwealth | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| Eastside Power Authority | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| Praxair | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| Pilot Power Group, Inc. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| Quiet Energy | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| Sempra Energy Solutions | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 5% | | |
| Strategic Energy LLC | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| Investor Owned Utilities | | | | | | | | | | | |
| BEAR VALLEY | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | 5% | | |

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| Retail Provider | Specific Claims | ALL retail providers are required to submit quarterly power content labels. | | | | ONLY retail providers that claim specific purchases are required to submit an Annual Label, Annual Report, and an Audit. | | | This is the renewable content of the retail provider's default product, as based on the SB 1305 definition of renewable. | | |
|--|-------------------------------------|---|-------------------------------------|-------------------------------------|-------------------------------------|--|-------------------------------------|-------------------------------------|--|--|--|
| | | 1st Qtr. Label | 2nd Qtr. Label | 3rd Qtr. Label | 4th Qtr. Label | Annual Label (True Up) | Annual Report | Audit or Letter of Attestation | % Renewable | | |
| MOUNTAIN UTILITIES | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| PACIFICORP | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| PG&E | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 12% | | |
| S.D.G.&E. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 8% | | |
| S.C.E. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 17% | | |
| SIERRA-PACIFIC | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| Power Pools | | | | | | | | | | | |
| Bonneville Power Administration (BPA) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| Department of Water Resources | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| Northern California Power Authority (NCPA) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | | | |

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|---------------------------------|-------------------------------------|---|-------------------------------------|-------------------------------------|-------------------------------------|--|-------------------------------------|-------------------------------------|--|--|--|
| | | 1st Qtr. Label | 2nd Qtr. Label | 3rd Qtr. Label | 4th Qtr. Label | Annual Label (True Up) | Annual Report | Audit or Letter of Attestation | % Renewable | | |
| USBR-CVP | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| USBR-PD | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| WAPA | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| Publicly Owned Utilities | | | | | | | | | | | |
| ANAHEIM | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 2% | | |
| ALAMEDA | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 45% | | |
| AZUSA | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 7% | | |
| BURBANK (Burbank Green Program) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | 100% | | |
| BANNING | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| BIGGS | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 14% | | |

Appendix A: 2005 RETAIL PROVIDER COMPLIANCE

| Retail Provider | Specific Claims | ALL retail providers are required to submit quarterly power content labels. | | | | ONLY retail providers that claim specific purchases are required to submit an Annual Label, Annual Report, and an Audit. | | | % Renewable |
|---------------------------|-------------------------------------|---|-------------------------------------|-------------------------------------|-------------------------------------|--|-------------------------------------|-------------------------------------|--|
| | | 1st Qtr. Label | 2nd Qtr. Label | 3rd Qtr. Label | 4th Qtr. Label | Annual Label (True Up) | Annual Report | Audit or Letter of Attestation | |
| CALAVERAS | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| COLTON | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 4% |
| ESCONDIDO | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| GRIDLEY | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| GLENDALE | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| HEALDSBURG | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 47% |
| IMPERIAL IRRIGATION DIST. | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 10% |
| LOS ANGELES D.W.P. | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | 5% (Including large hydro reported as small hydro) |
| LOMPOC | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 27% |
| LODI | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 24% |

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|-----------------|-------------------------------------|---|-------------------------------------|-------------------------------------|-------------------------------------|--|-------------------------------------|-------------------------------------|-------------|
| | | 1st Qtr. Label | 2nd Qtr. Label | 3rd Qtr. Label | 4th Qtr. Label | Annual Label (True Up) | Annual Report | Audit or Letter of Attestation | |
| LASSEN | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| MODESTO | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 4% |
| MERCED | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 8% |
| NEEDLES | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 3% |
| PASADENA | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 2% |
| PALO ALTO | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 8% |
| REDDING | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 4% |
| RIVERSIDE | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | 13% |
| ROSEVILLE | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 11% |
| S.F.H-H | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

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| Retail Provider | Specific Claims | ALL retail providers are required to submit quarterly power content labels. | | | | ONLY retail providers that claim specific purchases are required to submit an Annual Label, Annual Report, and an Audit. | | | % Renewable |
|----------------------|-------------------------------------|---|-------------------------------------|-------------------------------------|-------------------------------------|--|-------------------------------------|-------------------------------------|-------------|
| | | 1st Qtr. Label | 2nd Qtr. Label | 3rd Qtr. Label | 4th Qtr. Label | Annual Label (True Up) | Annual Report | Audit or Letter of Attestation | |
| SMUD | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | 13% |
| SHASTA | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| SILICON VALLEY POWER | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 22% |
| TRINITY | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| TRUCKEE | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| TUOLUMNE | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| TURLOCK | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 7% |
| UKIAH | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 47% |
| VERNON | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |